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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9
10 UNITED STATES OF AMERICA,) No. CR-11-0454-MAG
10) No. CR 11-00453-MAG
11 Plaintiff,)
11) STIPULATED REQUEST TO CONTINUE
12 v.) HEARING DATE TO AUGUST 2, 2011
12) AND TO EXCLUDE TIME UNDER THE
13 ALFONSO LARA,) SPEEDY TRIAL ACT AND [PROPOSED]
13) ORDER
14 Defendant.)
15)
15)
16 UNITED STATES OF AMERICA,)
16)
16 Plaintiff,)
17 v.)
17)
18 MARTHA LARA,) Hearing Date: July 28, 2011
18) Time: 9:30 a.m.
19)
19 Defendant.)
20)
21)

22 The above-captioned matters are set on July 28, 2011 before this Court for a status
23 hearing on detention, consent to magistrate jurisdiction, and further proceedings regarding U.S.
24 Marshals processing. The parties jointly request that the Court continue the matter to August 2,
25 2011 at 3:00 p.m. for CHANGE OF PLEA AND SENTENCING, and that the Court exclude
26 time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), between the date of

Stip. Req. To Continue Hearing Date and to
Exclude Time

1 this stipulation and August 2, 2011.

2 Defense counsel for Martha Lara has a scheduling conflict on July 28 and defense
3 counsel for both cases need additional time to review discovery and discuss the cases with their
4 clients.

5 The parties further stipulate and agree that the ends of justice served by this continuance
6 outweigh the best interest of the public and the defendants in a speedy trial. Accordingly, the
7 parties agree that the period of time from the date of this Stipulation to August 2, 2011, should
8 be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
9 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into account the
10 exercise of due diligence.

11 /S/
12 DATED: July 27, 2011

AVIVA GILBERT
Law Clerk, United States Attorney's Office

14
15 /S/
16 DATED: July 27, 2011

WADE RHYNE
Assistant United States Attorney

18
19 /S/
20 DATED: July 27, 2011

JOHN PAUL REICHMUTH
Assistant Federal Public Defender
Counsel for Alfonso Lara

22
23 /S/
24 DATED: July 27, 2011

ERICK GUZMAN
Counsel for Martha Lara

ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby
FINDS:

4 1. Given the defense need to review discovery;

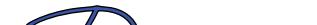
5 2. Given that defense counsel has a scheduling conflict on July 28, 2011;

6 3. Given that the ends of justice served by this continuance outweigh the best

7 interest of the public and the defendant in a speedy trial;

8 Based on these findings, IT IS HEREBY ORDERED that the STATUS date of July 28,
9 2011, scheduled at 9:30 a.m., before the Honorable Donna M. Ryu, be vacated and reset for
10 August 2, 2011, at 3:00 p.m. for CHANGE OF PLEA AND SENTENCING.

11 It is FURTHER ORDERED that time is excluded pursuant to the Speedy Trial Act, 18
12 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), from the date of this stipulation to August 2, 2011.

13
14 July 27, 2011 _____ 
15 HON. DONNA M. RYU
United States Magistrate Judge